



COMISION PARA LA INVESTIGACION Y DEFENSA DE LAS HORTALIZAS DE SINALOA

<http://www.cidh.org.mx>

Culiacan Sin., Mexico, July 24, 2006

USDA, AMS, FVP, FPB
Standardization Section
Room 1661 - South, STOP 0240
1400 Independence Avenue, SW
Washington, D.C. 20250-0240

Fax: (202) 720-8871

Email: FPB.DocketClerk@usda.gov

Re: Tomatoes on the Vine Standard (Docket Number FV-06-309)

Dear Sir or Madam:

CAADES appreciates the efforts of the U.S. Department of Agriculture (USDA) regarding the establishment of a separate standard for tomatoes on the vine (TOV). CAADES is now including comments for file by electronic delivery in this letter, with respect to the proposed standard by USDA. An original signed letter will be sent by express delivery, confirming our comments.

CAADES is a Mexican Confederation founded in 1936, located in the State of Sinaloa, in the West Coast of Mexico. It groups 10 different local associations representing 24,000 private growers, including those growing vegetable crops such as greenhouse tomatoes, in the state of Sinaloa.

The following comments have been prepared to be filed by your office.

1). Tolerance for individual packages.

CAADES supports the proposal to recognize higher tolerances within individual boxes. CAADES proposes that defects be scored based on the total count of tomatoes in the box and not based on the number of bunches or other type of containers into the box.

2). Shatter standard.

CAADES recognizes that much of the market appeal for consumers of TOV is purchasing tomatoes that are still on the vine, even though from a commercial standpoint virtually all tomatoes from a TOV are still sold to the consumer with minimal shrink, even if they are loose from the vine. This lack of lost sales is a result of current retail demand that directs suppliers to mark all pieces of fruit with a Price Look Up sticker for bulk product or to bag or pack into a single sale container. In





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addition, CAADES has seen no data from receivers concerning typical shatter amounts on arrival, meaning the proposed standard is an arbitrary number that reflects little on the salability of the product.

Therefore, CAADES is concerned about the proposed shatter standard. When the product is held at the correct temperature and humidity, the proposed standard works well. However, shatter significantly increases when the product is outside the ideal temperature and humidity ranges, is handled for inspection, or handled roughly during the offloading of pallets. At a minimum CAADES encourages USDA to direct inspectors in the inspection handbook to minimize handling of the TOV and to not remove the product from the bag before making the calculation regarding shatter.

Given these factors, the standard will create difficulties to adjudicate responsibility for failed lots as a result of shatter. CAADES requests that this tolerance be revisited after the standard has been in effect and the results of the inspections are better known.

3). Stems.

Given the inclusion of the shatter tolerance, CAADES believes that the condition of the stems is important as well. The proposed standard appears to read that moldy stems would be classified under other comments during an inspection, but would not be scored against the U.S. No. 1 grade. In addition, CAADES supports the brittle stem classification, upon the condition that the USDA use the standards in place for table grapes in establishing their definitions in the inspection handbook.

4). Maturity.

CAADES supports the maturity requirement that states that the tomatoes should show at least a break in color. The FPAA believes that tomatoes any less mature will likely have a negative impact on the consumption of the product with consumers.

5). Size standard.

CAADES suggests that the size standard be removed from the grade standard. The nature of TOV encourages a degree of variation of size of individual tomatoes within the cluster as well as the box. While CAADES appreciates the flexibility proposed by the USDA regarding size, the proposal does not advance current trade standards.

6). Exclusion of cocktail and cherry tomatoes on the vine.

CAADES believes that overall the proposed grade standard reflects the current varieties and characteristics of regular and roma tomatoes on the vine in today's market. However, the current varieties of cocktail and cherry tomatoes on the vine that are popular with consumers show some



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different characteristics that would not allow them to be marketed under the current grade standard. CAADES would, therefore, propose to exempt cherry and cocktail tomatoes on the vine from the standard.

CAADES wishes to recognize the effort and the work done by the staff of the USDA in developing a proposal to establish a standard for tomatoes on the vine. Thanks for filing this comments.

Sincerely,

Mario Robles.
Manager. CAADES Vegetable Division

